

# EXHIBIT J

IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

MARGARET CRAIG, as next of )  
kin and personal representative )  
of the estate of Angela Hulsey, )  
Plaintiff, )  
vs. ) No. 3:17-cv-01335  
 ) JURY DEMAND  
 ) JUDGE CAMPBELL  
CHEATHAM COUNTY, TENNESSEE, ) MAGISTRATE HOLMES  
et al., )  
Defendants. )

---

**The deposition of**

**JOHNNY J. HANNAH**

**November 6, 2018**

---

TAMI R. WEBB, RPR, LCR, CCR  
ACCURATE COURT REPORTING  
P.O. Box 682683  
Franklin, TN 37068  
(615) 244-DEPO or 244-3376  
www.ACR-Nashville.com

1 that involved medical care for detainees or inmates?

2 A. None.

3 Q. All right. What about any of the subsequent yearly  
4 training, either through the State or the County?

5 A. We would have had first aid and CPR in there.

6 Q. All right. Is that done on an annual basis?

7 A. Yes, sir.

8 Q. Okay. Is that a certified course where you  
9 actually are certified in first aid and CPR or...

10 A. Certified in CPR.

11 Q. Okay. Do any of those first aid and CPR courses --  
12 or were there any other training that you received in terms  
13 of recognition of illnesses?

14 A. We've had some mental health training through  
15 our --

16 Q. Okay.

17 A. -- QCHC provided for us.

18 Q. Other than mental health illnesses, just  
19 sicknesses, flus, anything like that?

20 A. No, sir.

21 Q. All right. Are you personally a member of any  
22 national organization that deals with either jail  
23 administration or law enforcement?

24 A. No, sir.

25 Q. Is the County or the sheriff's department like an

1 Q. Okay.

2 A. -- was the original one when we started.

3 Q. All right. And what type of information should be  
4 logged in that supervisor note?

5 A. Anything out of the ordinary that happened during  
6 the day that you think the next shift needs to know about.  
7 It's basically a shift briefing from one to the next so when  
8 they do their verbal brief so they don't forget about what  
9 happened throughout the day.

10 Q. All right. Another set of records that I saw from  
11 detentions for Ms. Hulsey prior to October 2016 that I didn't  
12 see for October 2016 were any inmate requests for medical  
13 care or sick call forms that I guess would have been put in  
14 through a kiosk?

15 A. Yes, sir.

16 Q. Do you know whether there was any problem with the  
17 kiosk system in keeping those types of documents from October  
18 2016 to October -- or October 6th, 2016, through October 12,  
19 2016?

20 A. No, sir. No, sir, there shouldn't have been no  
21 problem with the record.

22 Q. And you have searched the kiosk system for any type  
23 of medical care or sick calls for Ms. Hulsey?

24 A. I did.

25 Q. Okay. And you did not find any?

1       A. No, sir.

2       Q. Okay. And I want to make sure that I understand  
3 how the system works at Cheatham County as compared to how it  
4 may work at other jails. A kiosk is a physical machine that  
5 the inmate or detainee has their own code that they can enter  
6 and then put in grievances or put in sick calls?

7       A. Yes, sir.

8       Q. Is there anything else that that kiosk is used for  
9 by the detainees?

10      A. They use it to order their commissary. It has  
11 LexisNexis on it. And they order their phone minutes off of  
12 it.

13      Q. So is there any other information -- I know that  
14 Ms. Hulsey made phone calls during this time period. Would  
15 that information be contained within the kiosk for her?

16      A. Not the kiosk. That would be on the inmate  
17 telephone system, unless she used the telephone in booking.

18      Q. All right. And where is the inmate telephone  
19 system records kept?

20      A. It's a portal. It's basically a portal similar to  
21 the kiosk system that you can log on to and check by dorms,  
22 person's names, date, time.

23      Q. And have you checked that system to determine  
24 whether or not there's any information regarding Ms. Hulsey?

25      A. I did, yes, sir.

1       A. That depends. That's a subjective question.

2       Q. All right. I took it directly from the policy. So  
3 that's one of the reasons why I'm asking. What part is  
4 subjective that probably needs more information?

5       A. Well, "having trouble breathing." Are they  
6 choking? Are they coughing? Are they having a heart attack?  
7 It would depend on what level of having trouble breathing it  
8 would be.

9       Q. Okay. Let me ask this: What -- how would a jailer  
10 or an officer - corrections officer - determine whether the  
11 level of breathing is serious enough to contact 911?

12      A. I always tell them if they would take their child  
13 to the hospital for it or if they would take a loved one to  
14 the hospital for it, then take him to the hospital.

15      Q. All right.

16      A. Short of that they would contact a nurse.

17      Q. All right. So I think you used the term before.  
18 So the -- it's a very subjective thing --

19      A. Yes, sir.

20      Q. -- whether somebody is having trouble breathing?

21           All right. If an inmate is put on medical watch,  
22 the nurse must be contacted immediately. Does that conform  
23 with the policy or not conform with the policy?

24      A. Yes, sir.

25      Q. It does conform?